

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

AMBER MAREE CANTER,

Plaintiff,

v.

J. MICHAEL ZEIGLER, *et al.*

Defendants.

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Case No. 17-CV-0908 (GJH)

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STATUS REPORT

On April 20, 2022, this Court directed counsel for the State Defendants to provide a status report as to whether they had produced outstanding discovery by May 20, 2022, and if there was any need for this Court’s assistance concerning discovery disputes. It is the State Defendants’ position that overwhelmingly produced the outstanding discovery. Of all the Defendants that the Plaintiff has issued discovery requests to, only two (Zeigler and Liller, who are no longer State of Maryland employees) remain outstanding. Counsel for the State Defendants will continue to supplement responses and production. Furthermore, Plaintiff has sent two sets of discovery requests to “Correctional Officers Thompson and Barnes.” Counsel for State Defendants are unable to sufficiently identify those officers without their first names. The surnames of Barnes and Thompson have multiple listings under each name.

State Defendants have concluded their document production with regards to responses to document requests and interrogatory responses (other than for Defendants Zeigler and Liller, mentioned above). After evaluating any alleged deficiencies, State Defendants will provide information to Plaintiff for further document production, if any. State Defendants will also evaluate

and respond to the recent request concerning Plaintiff's inability to access .zip files that were previously produced.

Lastly, State Defendants have concluded their ESI/email production and will begin producing a privilege log along with addressing any perceived deficiencies by the Plaintiff. The State Defendants' overarching goal is to produce the requested documents as quickly as possible and to fully inform the Court of their progress.

Respectfully submitted,

BRIAN E. FROSH
Attorney General of Maryland

/s/

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Attorneys for the State Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of March, 2022, a copy of the foregoing Status

Report was sent electronically via PACER to:

Timothy Francis McCormack, Esquire
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/s/
Damon A. Pace
Assistant Attorney General